

Hon. Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

THE CITY OF SEATTLE, and its Department,
SEATTLE CITY LIGHT,

DEFENDANTS.

CASE NO. 16-CV-889 (RAJ)

STIPULATION AND [PROPOSED]
ORDER

Note for June 16, 2016

Plaintiff United States of America (“United States”), on behalf of its agency the Federal Bureau of Investigation (“FBI”), and Defendant the City of Seattle (the “City”), together with its Department Defendant Seattle City Light (“City Light”), hereby stipulate and agree, and respectfully request the Court enter an Order providing that the Court’s Temporary Restraining Order (“TRO”) entered on June 13, 2015 (Dkt. # 6) shall remain in effect until otherwise ordered by the Court. The parties submit that the extension of the TRO will avoid an unnecessary hearing, and allow the Parties to concentrate their efforts on resolving this case on the merits.

The Parties also stipulate and agree that the Court’s standard order regarding initial disclosures, joint status report, and early settlement, need not be issued. FRCP 26(a)(1)(a). As such, the Parties anticipate that this case will be resolved on motions for summary judgment based on

1 | declarations filed by the parties, with no need for formal discovery, and that the Parties will work
2 | cooperatively to propose an appropriate briefing schedule.

3 | The Parties also stipulate and agree that should either of the Public Records Act requesters
4 | who seek the records at issue in this case, be permitted to intervene as defendants in this action, the
5 | Parties will confer with the requester(s) regarding the summary judgment briefing schedule.

6 |
7 | **SO STIPULATED**

8 | PETE HOLMES
9 | Seattle City Attorney

ANNETTE L. HAYES
United States Attorney

10 |
11 | s/ Michael K. Ryan
12 | MICHAEL K. RYAN, WSBA #32091
13 | JESSICA NADELMAN, WSBA #27569
14 | Assistant City Attorneys
15 | Government Affairs
16 | Seattle City Attorney's Office
17 | Civil Division
18 | 701 Fifth Avenue, Suite 2050
19 | Seattle, WA 98104-7097
20 | Office: 206-684-8207
21 | michael.ryan@seattle.gov
22 | jessica.nadelman@seattle.gov

s/ Peter A. Winn
PETER A. WINN, WSBA #34701
KAYLA STAHPMAN, CA #228931
Assistant United States Attorneys
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
peter.winn@usdoj.gov
kayla.stahman@udsdoj.gov

SO ORDERED

Pursuant to the Stipulation of the Parties, it is hereby ORDERED, ADJUDGED AND DECREED that

(1) That the Court's Temporary Restraining Order entered on June 13, 2015 (Dkt. # 6), is and shall be continued indefinitely and that the hearing on a Preliminary Injunction is and shall be consolidated with the resolution of this case on the merits pursuant to Rule 65(a)(2);

(2) The Clerk is directed not to issue the Court's standard order regarding initial disclosures, joint status report, and early settlement;

(3) The Parties shall meet and confer, and within two weeks of the date of this Order, shall submit a briefing schedule for Plaintiff to file a motion for summary judgment; and

(4) Should any of the PRA requesters identified in the Plaintiff's TRO Motion (Dkt. # 2) seek leave to intervene in this case as Defendants, the Parties are directed to confer with the requesters regarding the above referenced briefing schedule.

Signed this June ____, 2016

RICHARD A. JONES
United States District Judge